

Mr. Troy A. Barber
Choctaw Road Landfill
22249 Choctaw Road
Franklinton, LA 70438

September 7, 2004

Re: Louisiana Solid Waste Regulation Committee
Proposed changes to current solid waste regulations

Dear Mr. Barber

Please review these proposed changes to the current solid waste regulations. As owner/operator of a permitted Type II solid waste facility we feel that these changes would be beneficial to our facility as well as other facilities throughout the state.

Industrial Solid Waste-Type I Facility

An issue that constantly arises during the permitting process for Type II facilities is the acceptance of industrial solid waste. Over the past years the term "industrial solid waste" has become somewhat of a "taboo" term. Any elected official associated with the approval of landfill permitting or permitting modification tries to stay away from this term. It is quite obvious that more parishes and governmental entities are looking at developing and operating their own solid waste facility. This includes parishes not located near the "chemical corridor" of Louisiana. Within many of these parishes are businesses that may produce waste that could be classified as "industrial solid waste". By not allowing Type II facilities to accept this type of waste it puts an economical burden on these businesses that ultimately trickles down to the consumer. According to requirements for the design and construction of solid waste facilities both Type I and Type II facilities must be constructed the same. They both must meet Subtitle D requirements for a geo-synthetic liner system as well as all monitoring requirements. If a Type II facility must burden the same construction and monitoring cost as a Type I facility then they should be allowed to broaden their waste acceptance. By reclassifying or deleting the term "industrial solid waste" it would allow solid waste facilities to accept more local waste without compromising the regulations.

Interim and Interim Compacted Cover

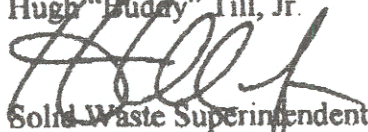
According to current regulations it is required that interim cover or interim compacted cover be applied to all operating areas which will not receive solid waste for a period for longer that 60 days. EPA regulations state that (6) six inches of daily cover be applied at the end of each daily operation and must be

maintained. I would like to see evidence that (6) six inches of daily cover is not adequate to protect the environment. If applied daily cover is capable of protecting the environment for 60 days then if it is maintained then it should be adequate for a much longer period of time. Application of interim or compacted interim cover requires many man hours and equipment hours to apply. This is required without evidence that it is required to protect the environment. In my opinion this is over kill and generates an expense to the facility that must be burdened by the consumer. I believe that daily cover vs. interim or interim compacted cover must be determined on a site specific basis. If a facility does not have a problem with leachate seeping from the side walls, nor is there a problem with uncontaminated storm water discharge analysis then it should not be required to apply a copious amount of soil to prevent a problem that does not exist. Current LPDES discharge permits are capable of determining if there is a problem with water contamination.

Please accept these as suggestions to improve the current regulations and make them friendlier for facilities that strive to meet or exceed environmental quality requirements.

Sincerely,

Hugh "Buddy" Till, Jr.



Solid Waste Superintendent
Tangipahoa Parish Regional Solid Waste Facility